

**UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

<b>IN RE:</b>	§	<b>CASE NO. 09-60792</b>
	§	
<b>GARY and INA ST. CLAIR,</b>	§	
	§	<b>CHAPTER 13</b>
<b>DEBTORS.</b>	§	

**UNITED STATES OF AMERICA'S OBJECTION TO  
CONFIRMATION OF DEBTOR'S PLAN OF REORGANIZATION**

The United States of America, on behalf of the Internal Revenue Service , files this objection to confirmation of the debtor's plan of reorganization and represents the following:

1. The United States objects to confirmation because the debtors' plan fails to pay the Internal Revenue Service's allowed priority and secured claim.
2. The United States objects to confirmation of the debtors plan because the debtors have failed to file all pre petition tax returns. It appears the 940 for 2003, 2004 and 2005 , the 941 for the 2<sup>nd</sup> quarter of 2006 and the 1040 for the 2008 tax year have not been filed..
3. The United States also objects to confirmation on the basis that the plan is not feasible.

Wherefore, the United States prays that the debtors plan not be confirmed.

Respectfully submitted,

JOHNNY SUTTON  
UNITED STATES ATTORNEY

By:

/s/ STEVEN B. BASS  
STEVEN B. BASS  
Assistant United States Attorney  
816 Congress Avenue, Suite 1000  
Austin, Texas 78701  
(512) 916-5858/Fax (512) 916-5854  
Florida State Bar No. 767300  
Counsel for the United States of America

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing “United States of America’s Objection to Confirmation of Debtor’s Plan of Reorganization” has been mailed either by the Courts electronic mail system or via First Class Mail on this the 19<sup>th</sup> day of November 2009, to the following:

Gary and Ina St Clair  
614 S. Commerce St  
Bremond, TX 76629

Frank Steelman  
1810 Greenfield Plaza  
Bryan Tx 77802

Ray Hendren  
8310 Capital of Texas Hwy North  
Ste 475  
Austin tx 78731

/s/ STEVEN B. BASS  
STEVEN B. BASS  
Assistant United States Attorney